

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
VICTORIA DIVISION**

**RICHARD M. SCOTT**

**Plaintiff,**

**vs.**

**BP AMOCO CHEMICAL COMPANY  
Defendant.**

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**CIVIL ACTION NO. 06-CV-0079**

**PLAINTIFFS' DESIGNATION OF EXPERT WITNESSES**

\_\_\_\_COME NOW, Plaintiff, Richard Scott, and hereby designate the following persons as

Expert Witnesses in this cause:

Charles Bullock  
404 Charleston  
Victoria, Texas 77904  
(361) 576-3151

Professor Bullock is Dean of the Business School at the University of Houston-Victoria and is a professor of accounting and will testify regarding each Plaintiff's economic losses, including past, present, and future lost wages, and past, present, and future lost benefits as a result of his loss of employment.

The expert accountant will base that testimony on the expert accountant's investigation, analysis and review of: Plaintiff's earnings statements; summary of job benefits; summary of insurance benefits; and estimates on the costs to obtain comparable insurance. The expert accountant will also base that testimony on the expert accountant's education and experience.

John W. Griffin, Jr.  
Marek, Griffin & Knaupp  
203 N. Liberty Street  
Victoria, Texas 77901  
(361) 573-5500

Bobby D. Brown  
Law Offices of Bobby D. Brown  
104 Kelly Drive, Suite D  
Victoria, Texas 77901  
(361) 572-9944

The subject matter about which John W. Griffin, Jr. and Bobby D. Brown (hereafter collectively the "attorneys' fees experts") are expected to testify includes: the subject of attorneys' fees, what a reasonable and necessary amount of attorneys' fees and expenses would be for the prosecution, handling and appeal of this case and whether the time and activities undertaken by plaintiffs' attorneys were reasonable and necessary.

The attorneys' fees experts have had experience handling cases similar to the plaintiff's cases. The mental impressions and opinions held by the attorneys' fees experts are that the hourly value of attorneys' fees incurred by the Plaintiff to prosecute this case to date and through the time of trial has been and is reasonable and necessary in the area; that the hourly rates charged by the attorneys and paralegals in this case are fair and reasonable in area; that the work they performed was necessary and reasonable; and in the event of an appeal of this case, the necessary attorneys fees that would be incurred to defend same.

The facts known to the attorneys' fees experts include: the attorneys' fees experts' education, experience, background, and training; a review of the Plaintiff's most recent Complaint and Defendants' most recent Answer filed in this case; knowledge of Plaintiff's attorney's law practice, teaching, publications, education, training and experience; knowledge about Plaintiff's counsel's reputation; the knowledge that John G. Griffin, Jr. is board certified in the area of Civil Trial, Personal Injury and Consumer Law; and Bobby Brown is board certified in the area of Employment Law.

Respectfully submitted:

s/ John W. Griffin  
**JOHN GRIFFIN, JR.**  
Federal Bar No. 2238  
State Bar No. 08460300  
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**ATTORNEYS FOR PLAINTIFF**

**CERTIFICATE OF SERVICE**

I hereby certify that on March 1, 2007, I electronically filed the foregoing pleading using the Court's CM/ECF system to the following:

Richard A. Schwartz  
SCHWARTZ, JUNELL, CAMPBELL & OATHOUT, L.L.P.  
909 Fannin, Suite 2700  
Houston, Texas 77010

s/ John W. Griffin  
John W. Griffin